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June 19, 2020

BY ECF

Hon. Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Grablis v. Onecoin Ltd., et al., 19-04074 (VEC)

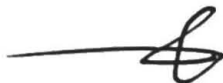
Dear Judge Caproni:

I am writing on behalf of defendant Konstantin Ignatov to respectfully request a three week extension of time in which to file Mr. Ignatov's answer to the amended complaint and any motions, which are presently due on June 25. This is Mr. Ignatov's first request for an extension of time. The reason for this request is that we are actively engaged in settlement negotiations with the plaintiffs in this matter, which may obviate the need for Mr. Ignatov's responsive pleadings. I have conferred with counsel for Mr. Ignatov's co-defendants and the plaintiffs, who have no objection. Should the Court grant this application, the revised briefing schedule as it applies to Mr. Ignatov would be as follows:

- Defendant Ignatov's answer to the amended complaint and any motions due by July 16, 2020;
- Plaintiff's response due by September 2, 2020; and
- Defendant's reply due by September 23, 2020.

Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,



Jeffrey Lichtman

cc: All counsel (by ECF)